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July 7, 1987

TO: C. A. DYKES
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FROM: R. J. ZIPFEL

C-8 CONTROL PROGRAM

My review on this issue with Dr. Bruce Karrh on June 11, 1987, went very well with little change required to our present control program. Dr. Karrh was most interested in the presence of C-8 outside the plant boundaries. He stated that we need to place the highest priority on these environmental issues. Dr. Karrh also accepted the position that our employees will continue to have C-8 in their blood. My charts and the specific comments made during the review are attached.

The following is a restatement of the specific program items in our C-8 control plan with the necessary action steps indicated.

I. ADMINISTRATIVE CONTROLS

A. EQUIPMENT DESIGN

1. IMPLEMENT AN IMPROVED FINE POWDER DRYER GASKET DESIGN (RESP - KLINE)

B. PROTECTIVE EQUIPMENT

1. AUDIT WASHINGTON WORKS C-8 IN BLOOD AND C-8 IN AIR DATA TO DETERMINE IF CURRENT PROTECTIVE EQUIPMENT (AND OPERATING PROCEDURES) ARE THE OPTIMUM AVAILABLE (RESP - LOSCHIAVO)

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C. C-8 MONITORING

1. REDUCE EMPLOYEE BLOOD TESTING TO ONLY THE FOLLOWING JOBS:

- RAW DISPERSION AUTOCLAVE OPERATOR
- DISPERSION OPERATOR
- FINE POWDER DRYER OPERATOR
- ENVIRONMENTAL OPERATOR (SUMP)
- DISPERSION PACKOUT OPERATOR
- GRANULAR POLYKETTLE OPERATOR
- FINE POWDER PACKOUT OPERATOR
- FEP POLYKETTLE OPERATOR
- FEP WET FINISHING OPERATOR
- FEP DISPERSION OPERATOR
- FIRST LINE SUPERVISION OF ABOVE PERSONNEL

(RESP - LANYON)

NOTE: BEFORE WE CHANGE OUR BLOOD SAMPLING PROGRAM, WE WILL WANT TO
HAVE AN INTERNAL BTO COMMUNICATION (RESP - ZIPFEL)

2. PERSONAL C-8 IN AIR SAMPLING - MONTHLY SAMPLES SHOULD BE REQUIRED OF
THE FOLLOWING JOBS:

- RAW DISPERSION AUTOCLAVE OPERATOR
- GRANULAR POLYKETTLE OPERATOR
- FINE POWDER DRYER OPERATOR
- DISPERSION OPERATOR
- FEP POLYKETTLE OPERATOR
- FEP WET FINISHING OPERATOR
- FEP DISPERSION OPERATOR

(RESP - POLYMERS - OTT
COPOLYMERS - POST)

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3. AREA C-8 IN AIR MONITORING - AS NEEDED BY AREA AROUND CRITICAL EQUIPMENT (e.g., FINE POWDER DRYERS) AND TO RESPOND TO HIGH LEVELS NOTED WITH PERSONAL SAMPLES (RESP - POLYMERS - OTT
COPOLYMERS - POST)

NOTE: IN GENERAL, WE ARE TAKING FAR TOO MANY AREA SAMPLES AND NOT ENOUGH PERSONAL SAMPLES

4. DOCUMENTATION - EXPLANATIONS OF REASONS AND ACTION RESPONSE FOR AIR LEVELS (PERSONAL SAMPLES ONLY) ABOVE 50% OF THE AEL (0.56 MPB) REQUIRE IMPROVEMENT IN THE DIVISION'S ENVIRONMENTAL SAMPLING BOOKS (RESP - POLYMERS - OTT
COPOLYMERS - POST)

D. C-8 CONTROL LEVELS

1. ESTABLISH MAXIMUM SAFE C-8 IN BLOOD AND C-8 IN DRINKING WATER LEVELS (RESP - G. L. KENNEDY - HASKELL)

NOTE: ONCE A SAFE LEVEL IS ESTABLISHED, THOSE PERSONNEL EXCEEDING 50% OF THIS LEVEL WILL BE REQUIRED TO BE REMOVED FROM THE EXPOSURE AREA

II. PROCESS CHANGES

- A. IMPLEMENT USE OF PURCHASED LIQUID C-8 AS IS BEING DONE AT DORDRECHT AND CHAMBERS WORKS (RESP - POLYMERS - CRUM
COPOLYMERS - HERRIDGE)

B. NEW SURFACTANTS

1. TBSA IN FEP - REDUCE PRIORITY ON THIS PROGRAM TO THE POINT WHERE BUSINESS NEEDS JUSTIFY FURTHER USE (QUALITY AND COST) (RESP - HERRIDGE)
2. C-9, C-10, C-12 - NO ENVIRONMENTAL LIMITS ARE PLACED ON THE USE OF NEW SURFACTANTS

C. C-8 RECOVERY

1. FINE POWDER DRYER VENT - DEVELOP BASIC DATA TO IDENTIFY RECOVERY PROCESS BY 4Q87 (RESP - SCHNEIDER)
2. FEP AQUEOUS STREAMS - APPLY ABOVE TECHNOLOGY IF ECONOMICAL (RESP - SCHNEIDER)

D. LUBECK WATER DISTRICT CONTAMINATION

1. ELIMINATE SUPERNATE PONDS - GOAL IS NOVEMBER 1987 (RESP - FLENSBORG)
2. DETERMINE MODE OF CONTAMINATION (RESP - STEWART)